EXHIBIT 31

From: Preetpal Grewal
Sent: Tuesday, September 28, 2010 10:50 AM
To: Jon Cuneo
Subject: Potential Antitrust Case

Hi Jon,

Here is the link to the DOJ investigation that I was talking of yesterday.

http://www.bloomberg.com/apps/news?pid=newsarchive&sid=adUuogHMxpJA

Regards,

Preet

From: Preetpal Grewal
Sent: Tuesday, September 28, 2010 10:52 AM
To: Jon Cuneo
Subject: RE: Potential Antitrust Case
Attachments: EU investigates suspected cartel MEMO-10-49_EN[1].txt

Jon,

Attached is the EU memo regarding investigation into suspected cartel in the sector of automotive electrical and electronic components suppliers.

Regards,

Preet

From: Preetpal Grewal
Sent: Tuesday, September 28, 2010 10:50 AM
To: Jon Cuneo
Subject: Potential Antitrust Case

Hi Jon,

Here is the link to the DOJ investigation that I was talking of yesterday.

http://www.bloomberg.com/apps/news?pid=newsarchive&sid=adUuogHMxpJA

Regards,

Preet

EU Investigates suspected cartel MEMO-10-49_EN1

MEMO/10/49

Brussels, 25 February 2010

Antitrust: Commission confirms investigation into suspected cartel in the sector of automotive electrical and electronic components suppliers

The European Commission can confirm that, starting on 24 February 2010, Commission officials carried out unannounced inspections in several Member States at the premises of companies active in the sector of automotive electrical distribution systems (sometimes referred to as wiring harnesses) and of other components for automotive electronic and electrical distribution systems. The Commission has reason to believe that the companies concerned may have violated EU antitrust rules that prohibit cartels and restrictive business practices (Article 101 of the Treaty on the Functioning of the European Union - TFEU and Article 53 of the Agreement on the European Economic Area). The Commission's investigation is being coordinated with several other competition authorities worldwide

Wire harnesses are generally considered the "central nervous system" of a car, linking the car's computers to the various relevant functions in the vehicle.

The Commission officials were accompanied by their counterparts from the relevant national competition authorities.

Surprise inspections are a preliminary step into suspected anticompetitive practices.
The fact that the European Commission carries out such inspections does not mean that the companies are guilty of anti-competitive behaviour nor does it prejudge the

outcome of the investigation itself. The European Commission respects the rights of defence, in particular the right of companies to be heard in the Commission's proceedings against them.

There is no strict deadline to complete inquiries into anticompetitive conduct. Their
duration depends on a number of factors, including the complexity of each case, the extent to which the undertakings concerned co-operate with the Commission and the exercise of the rights of defence.

Cuneo

From: Preetpal Grewal
Sent: Saturday, October 2, 2010 2:51 PM
To: Jon Cuneo; Charles LaDuca
Subject: NEW POTENTIAL CASES (OTHER THAN FREIGHT-FORWARDER CASE)
Attachments: ELECTRONICS CARTEL UNDER INVESTIGATION BY DOJ AND EU.doc; eu cartel d ecision for bathroom manf.doc; TRUCK INVESTIGATION.pdf; TRUCK MANUFACTURERS UNDER PROBE.doc

Dear Jon and C.J.,

Here is a list of potential cases:

1. Electronics price-fixing class action against car wire harness manufacturers. The DOJ, EU and Japanese Commission are currently investigating the following companies:

Yazaki North America Inc. in Canton;
Denso International America Inc. in Southfield; and
Tokai Rika Co. in Plymouth
Lear Corp. of Southfield
Sumitomo Electric Industries Ltd.
Furukawa Electric Co.
SY Systems Technologies GmbH

FBI had conduced raids in connection with these anti-trust investigations. I am attaching herewith news clippings of the investigations. (Please see attachment Electronics Cartel Under Investigation). At this stage, any suggestions for further investigations in this matter are most welcome.

2. Potential Securities Action Against Freight Forwarder Companies

All freight forwarder companies under investigation are publically traded companies with billions of dollars in annual revenues. We could securities actions against these companies.

a. Expeditors International of Washington, Inc., is one of the freight-forwarder company that was subpoenaed by the DOJ. It has been cooperating in the ongoing investigations and made the following disclosures in their Form 10-K (2009-2010 Statement)

> As a multinational corporation, the Company is subject to formal or informal investigations or litigation from governmental authorities in the countries in which it does business. The Company is currently subject to, and is cooperating fully with, an investigation by the U.S. Department of Justice (DOJ) of air cargo freight forwarders. In addition, the Company and its Hong Kong subsidiary received a Statement of Objections from the European Commission (EC) relating to an ongoing investigation of freight forwarders. These investigations will require further management time and cause the Company to incur substantial additional legal and related costs, which could include fines and/or penalties if the DOJ and/or EC concludes that the Company has engaged in anti-competitive behavior and such fines and/or penalties could have a material impact on the Company's financial position, results of operations and operating cash flows.

Cuneo (

[redacted]

b. Other potential companies that I am currently investigating are:

UPS
DHL
EGL, Inc.
UTi Worldwide Inc.
Con-Way Inc.
Airborne Express
Air Express
Nippon
DSV
Nissin Co.
Yamato
ABX Air Inc.
American Airlines
AMR Corp.
and other freight forwarder companies involved in the cartel and listed with SEC.

Any and all suggestions for further investigation are welcome.

3. Bathroom Manufacturers Price Fixing Cartel

Please see the attached decision by the EU Commission fining the companies involved. At least two US companies are involved in the cartel. Masco is a very large US company. DOJ might possibly be investigating this matter. At this stage, all suggestions for further investigation are welcome.

4. I have also looked at a number of investigations against truck manufacturers in Europe. Attached is a news clipping -- I have not had the time to look any further.

Also, as you probably know that there was a new LCD investigation started by the DOJ. Attorney General for New York has filed an antitrust lawsuit against several companies accused of price fixing. Here is the recent release:

New York targets LCD cartel
Monday, 9 August 2010
Faaez Samadi

New York's Attorney General, Andrew Cuomo, has filed an antitrust lawsuit against several companies accused of fixing prices in the liquid crystal display (LCD) market.

We couldinvestigate other cases. There are plenty.

Regards,

Preetpal Grewal

Cuneo Gilbert & LaDuca, LLP

ELECTRONICS CARTEL UNDER INVESTIGATION BY DOJ AND EU

POTENTIAL LAW SUIT

NEWS CLIPPINGS

MEMO/10/49

Brussels, 25 February 2010

Antitrust: Commission confirms investigation into suspected cartel in the sector of automotive electrical and electronic components suppliers

The European Commission can confirm that, starting on 24 February 2010, Commission officials carried out unannounced inspections in several Member States at the premises of companies active in the sector of automotive electrical distribution systems (sometimes referred to as wiring harnesses) and of other components for automotive electronic and electrical distribution systems. The Commission has reason to believe that the companies concerned may have violated EU antitrust rules that prohibit cartels and restrictive business practices (Article 101 of the Treaty on the Functioning of the European Union – TFEU and Article 53 of the Agreement on the European Economic Area). The Commission's investigation is being coordinated with several other competition authorities worldwide

Wire harnesses are generally considered the "central nervous system" of a car, linking the car's computers to the various relevant functions in the vehicle.

The Commission officials were accompanied by their counterparts from the relevant national competition authorities.

Surprise inspections are a preliminary step into suspected anticompetitive practices. The fact that the European Commission carries out such inspections does not mean that the companies are guilty of anti-competitive behaviour nor does it prejudge the outcome of the investigation itself. The European Commission respects the rights of defence, in particular the right of companies to be heard in the Commission's proceedings against them.

There is no strict deadline to complete inquiries into anticompetitive conduct. Their duration depends on a number of factors, including the complexity of each case, the extent to which the undertakings concerned co-operate with the Commission and the exercise of the rights of defence.

European Commission confirms cartel investigation into the electronic distribution systems market

09 March 2010

The European Commission recently confirmed that it has conducted unannounced inspections at the premises of companies in several Member States, investigating suspicions of their involvement in a secret price fixing cartel.

The European Commission did not identify the companies but confirmed that they are leading players in the lucrative automotive electronic and electrical distribution systems market. More specifically, they supply car manufacturers with wire harnessing products, used to link a car's computers to the relevant functions in the vehicle (e.g. stereos and electric windows).

The raids formed part of a coordinated global investigation involving several competition authorities worldwide. So far, companies in Europe, Japan and the United States have been identified.

A cartel is an arrangement (which need not be in writing) between competitors to take a particular course of conduct that will have the effect of raising prices of a product or service above the level that would be obtained under normal market conditions. Cartels are illegal under both EU and UK competition law and breaches can result in heavy fines of up to 10% of group worldwide turnover.

Typical aspects of cartel activity include competing companies joining together to:

- Fix prices – direct or indirect fixing of purchase or selling prices or any other trading conditions may be considered anticompetitive. Examples include agreements to set minimum prices or co-ordination of the timing of price increases;
- Limit production – this includes activities which have the effect of limiting or controlling production, markets, technical development or investment;
- Share markets, customers or sources of supply – while this often involves agreements not to sell the same product in the same area it also includes agreements to share sources of supply to the detriment of other competitors;
- Bid rigging – where parties agree the outcome of a tender process amongst themselves either by deciding in advance which company will bid or who will bid the best price, thereby eliminating fair competition from the tender process.

Cartel activity is almost always accompanied by the exchange of commercially sensitive information between competitors.

Firms should bear in mind that both the European Commission and the Office of Fair Trading operate leniency policies under which the first party to blow the whistle on anti-competitive behaviour may benefit from up to a 100% reduction of the fine payable. This approach is intended to encourage companies to hand over evidence of cartel activity. It should be noted that such raids are considered a preliminary step. It remains to be seen, therefore, what the outcome of this large-scale investigation will be. Depending on the complexity of the case and the level of co-operation from the companies involved, the investigation could take a number of years to complete.

Nicola Kingaby, Competition associate at TLT, comments, "the outcome of this investigation will be of interest to both firms involved in similar cartelistic behaviour, and to purchasers who believe they have been on the receiving end of such anti-competitive practices."

Firms concerned that they too may be involved in prohibited behaviour:

- should consider adopting a competition compliance programme to avoid future infringements; and
- ought to consider the benefits of blowing the whistle to take advantage of current leniency provisions.

Firms which believe they have suffered damage as a result of anti-competitive behaviour should be aware that they are able to take steps to end such practices and make a claim for damages.

For more information, please contact Nicola Kingaby.

Yazaki, Car Components Makers Are Probed by EU, U.S. (Update1)

By Peter Chapman - February 25, 2010 11:57 EST

Feb. 25 (Bloomberg) -- Yazaki Corp. and other vehicle- electronics manufacturers are under investigation by the European Union as part of a joint probe with the U.S. into possible price fixing.

The European Commission said it inspected the premises of companies that make automotive electrical distribution systems, or wiring harnesses, as well as manufacturers of other parts for automotive electronic and electrical distribution systems.

"The commission has reason to believe that the companies concerned may have violated EU antitrust rules that prohibit cartels," the Brussels-based regulator said in a statement.

The commission said the probe is being coordinated with other competition regulators around the world. The U.S. Justice Department said yesterday it's investigating possible anticompetitive conduct among automotive electronic component suppliers, a day after the FBI raided three companies.

"Auto suppliers overall are so squeezed, as an industry they can barely stand up," said Michael Andersson, an analyst at Evli Bank Plc in Stockholm.

Tokyo-based Yazaki said in a statement on its Web site today that its European unit was investigated by the commission yesterday.

The EU agency has the power to take action against companies for fixing prices, sharing markets or abusing their market power, and can fine a company as much as 10 percent of sales. Gina Talamona, a spokeswoman at the Washington-based Justice Department, said yesterday that the U.S. regulator is coordinating its probe with the EU and other overseas antitrust authorities.

FBI Raids

The Federal Bureau of Investigation conducted searches on Feb. 23 of three auto-parts makers in Michigan: Yazaki North America Inc. in Canton; Denso International America Inc. in Southfield; and Tokai Rika Co. in Plymouth, said Sandra Berchtold, an FBI spokeswoman in Detroit. Yazaki said in a statement its facilities in Lexington, Kentucky, and Columbus, Ohio, also were "visited" by government officials.

The three companies supply automakers including Toyota Motor Corp., which is facing U.S. scrutiny over recalls of defective vehicles. The companies said they were cooperating with the antitrust officials.

Sjoerd Dijkstra, a spokesman for Denso Corp.'s European division in Weesp, Netherlands, said there has been no raid at the company's offices in the region. The manufacturer is "fully complying" with the investigation in the U.S., he said.

No Swedish auto suppliers have been raided, according to Svenaake Berglie, the head of FKG, the country's car-component industry association.

Continental AG spokesman Hannes Boekhoff said the Hanover, Germany-based company, Europe's second-biggest car-parts maker, isn't directly affected by the investigation. Calls seeking comment from officials at S-Y, a joint venture with Yazaki that Continental inherited in the takeover of Siemens AG's VDO auto-components division, weren't immediately returned.

To contact the reporter on this story: Peter Chapman in Brussels at Pchapman10@bloomberg.net.

To contact the editor responsible for this story: Anthony Aarons at aaarons@bloomberg.net

Auto Suppliers Under U.S. Antitrust Investigation (Update2)

February 24, 2010, 6:09 PM EST

More From Businessweek

(Adds Yazaki locations in third paragraph.)

By Justin Blum and Margaret Cronin Fisk

Feb. 24 (Bloomberg) -- The U.S. Justice Department said it's investigating possible anticompetitive conduct among automotive electronic component suppliers, a day after the FBI raided three companies.

The department is coordinating its probe with the European Commission and other overseas antitrust authorities, Justice Department spokeswoman Gina Talamona said in an e-mail today.

The Federal Bureau of Investigation yesterday conducted searches of three auto-parts makers: Yazaki North America Inc. in Canton; Denso International America Inc. in Southfield; and Tokai Rika Co. in Plymouth, said Sandra Berchtold, an FBI spokeswoman in Detroit. Yazaki said in a statement that its facilities in Lexington, Kentucky, and Columbus, Ohio, also were "visited" by government officials.

The three companies supply automakers including Toyota Motor Corp., which is facing U.S. scrutiny over recalls of defective vehicles. The antitrust investigation is unrelated to the defects, according to a person familiar with the matter who spoke on condition of anonymity. The person wasn't authorized to comment publicly.

The department is investigating "the possibility of anticompetitive cartel conduct" among suppliers, Talamona said.

Denso Cooperates

Denso is cooperating with the investigation, said Bridgette Gollinger, a spokeswoman for the company's Michigan subsidiary. Denso is a unit of Denso Corp., an auto-parts maker based in Kariya, Japan.

Joe Rine, a spokesman for the U.S. unit of Tokai Rika, which is based in Japan's Aichi prefecture, said his company also is cooperating. The FBI "requested additional information that we need to supply in the future, which we will do and meet their time line," he said.

Yazaki North America, a unit of Tokyo-based Yazaki Corp., is cooperating with the investigation and hasn't been informed of the details of the probe, according to a statement from company spokeswoman Shefali Cromer.

Toyota, based in Toyota City, Japan, is the largest shareholder in Denso and Tokai Rika. Toyota said in a statement that it hasn't been contacted by authorities, though it is aware suppliers have been.

--With assistance from Alan Ohnsman in Los Angeles and Keith Naughton in Detroit. Editors: Jim Rubin, Laurie Asseo.

To contact the reporters on this story: Justin Blum in Washington at jblum4@bloomberg.net; Margaret Cronin Fisk in Detroit at mcfisk@bloomberg.net

To contact the editor responsible for this story: Jim Kirk at jkirk12@bloomberg.net

From: Preetpal Grewal
Sent: Monday, October 4, 2010 5:55 PM
To: Jon Cuneo
Subject: RE: Memo

Most welcome. I will talk to the director of the association. I am going to research Tata, because I believe it entered into a joint venture with Yazaki as distributor and/or manufacturer or electrical distribution systems. Not sure of exact nature of the venture -- will know more soon.

Preetpal Grewal

Cuneo Gilbert & LaDuca, LLP
Rockefeller Center
620 Fifth Avenue
New York, NY 10020
Phone: (917) 639-5510
Cell: (917) 902-7476

From: Jon Cuneo
Sent: Monday, October 04, 2010 5:58 PM
To: Preetpal Grewal; Charles LaDuca
Subject: RE: Memo

Tx much. Will read it tonight.

From: Preetpal Grewal
Sent: Monday, October 04, 2010 5:48 PM
To: Jon Cuneo; Charles LaDuca
Subject: Memo

Jon,

Attached please find my memo. I have included both direct and indirect purchasers under Typical purchasers heading. Happy to edit it as necessary.

Regards,
Preetpal Grewal

Cuneo Gilbert & LaDuca, LLP
Rockefeller Center
620 Fifth Avenue
New York, NY 10020
Phone: (917) 639-5510
Cell: (917) 902-7476

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MEMORANDUM

Automotive Electrical Distribution Systems

Global Price Fixing Cartel

I. Background

On February 23, 2010, surprise inspections and searches in the automotive electrical distribution systems industry took place as part of an internationally coordinated investigation into price-fixing and customer allocation on the sales of automotive electric systems used to link a car's computers to the relevant functions in the vehicle. The companies being investigated are suspected of forming a price-fixing cartel in the global market, in violation of the competition laws of the United States and elsewhere. These wire harness manufacturers began colluding in 2003 to divide up orders from automakers. Action by governmental anti-trust authorities of the United States, European Union, and Japan are ongoing in order to investigate and prosecute the global cartel.

II. The Cartelists

The wire harness manufacturers that are subject to the investigation include the following companies:

THE PARTICIPANTS	THE INVESTIGATION
Yazaki Corp.	Under Investigation by the United States Department of Justice, EU Commission and Japan Fair Trade Commission. Its offices in US, EU and Japan were raided. Yazaki is co-operating with the investigation.
Denso International America Inc.	Under Investigation by the United States Department of Justice and EU Commission. Its offices in US were raided by the FBI. Denso is cooperating with the investigation.

Tokai Rika Co.	Under Investigation by the United States Department of Justice and the EU Commission. Its offices in the US were raided by the FBI. Tokai is cooperating with the investigation.
SY Systems Technologies GmbH	Under Investigation by the United States Department of Justice and the EU Commission.
Sumitomo Electric Industries Ltd.	Under Investigation by the Japan Fair Trade Commission. Its offices in Japan were searched.
Furukawa Electric Co.	Under Investigation by the Japan Fair Trade Commission. Its offices in Japan were searched.
Leoni AG	Under Investigation by the EU Commission. Leoni is cooperating with the commission.

III. The Product

The automotive electrical distribution systems market (aka wire harness) is a multi-billion dollar industry. The companies being investigated hold more than 90 percent of the auto harness market, valued at more than $4.4 billion. In 2009, Yazaki which employs 150,000 people globally reported revenue of US$7,548 million from sale of electrical distribution systems.

The electrical distribution systems or wiring harness of the car is the second most expensive part in the car after the engine. The basic function of an electrical distribution system is to provide the electrical interconnections necessary to distribute electrical power and signals around the car. An electrical distribution system consists of a fusion of tightly bundled round wire harness assemblies, terminal and connector products, fuse boxes and junction boxes. This network winds its way to virtually every part of a vehicle, from the front lighting through the engine compartment, cockpit, and interior to the boot. The wire harness itself consists of raw, coiled wire that is cut to length and terminated. Wiring assemblies are typically a combination of round wire, flat wire, ultra thin wall cable and connection systems into complete systems for the distribution of power and signal throughout a vehicle.

This business, though dominated by a handful of companies, is competitive as makers fight for contracts with car makers and search for ways to lower prices to boost profit margins.

IV. Typical Purchasers or Victims of the Cartel

Direct purchasers would include the car manufacturers that have purchased electrical distribution systems from the companies involved in the cartel in the United States.

Indirect purchasers would include companies that have purchased the electrical distribution systems manufactured by the companies involved in the cartel from distributors or wholesalers.

It is important that the contract or purchase agreement should have been made in the US.

V. Counsel

In antitrust litigation such as the type contemplated against the electrical distribution systems cartelists, cartel victim typically recover a significant percentage of their total purchases of the price-fixed product, depending upon the results of the economic analysis performed.

Cuneo Gilbert & LaDuca, LLP will seek recovery for these victims' losses through settlement and if necessary through litigation. We encourage all purchasers from the cartelists to claim their losses through civil redress, as the fines levied by the commissions investigating the cartel companies is not distributed as compensation to the victims. Participation in recovery proceedings by large and diversified cartel victims is essential to the recovery of these overcharges by all cartel victims.

Cuneo Gilbert & LaDuca, LLP is a leading class action firm dedicating to representing victims of anti-competitive market behavior. Participation in a US civil process will not result in any out-of-pocket cost or fees or risk to any claimant.

From: Preetpal Grewal
Sent: Tuesday, October 5, 2010 2:17 PM
To: Jon Cuneo
Subject: DOJ Investigation -- Revised Memo (2 more companies added)
Attachments: Wire Harness Memo.doc

Jon,

I revised the memo -- added two more companies that are being investigated. At this stage we do not have enough information to determine the extent of the DOJ investigation of companies in the US that are being investigated by the EU Commission. How do we find this information? Is there any way to find out the extent of the cartel?

I believe Tata Motors would be a great plaintiff. In 2008 they acquired Jaguar and Land Rover (from Ford) in 2008 and probably contiunued to purchase parts from prior dealers. Tata had probably also purchased wire harnesses from companies in the US. Trying to find the information.

Yazaki has entered into a joint venture (sometime in the 1990s) with Tata for manufacture and distribution of wire harness. It is a separate independent company. I do not believe the joint ventures are part of the investigation (given that only one joint venture has been questioned by the EU Commission). Do you think this would still be a conflict? I could research this issue.

As you probably know Tata Group is a muti-national conglomerate with 114 companies in seven business sectors: and information technology, engineering, materials, services, energy, consumer products and chemicals. They are, by and large, based in India and have significant international operations. The total revenue of Tata companies, taken together, was $70.8 billion. This could be a great client -- I am sure they have a lot of international joint ventures.

US DIRECT PURCHASER: The three companies that were raided by the FBI supply to the following companies: (1) Yazaki supplies components to BMW, Chrysler, Daimler, Ford, GM, Honda, Mitsubishi, Renault-Nissan, Toyota and Volvo; (2) Denso's customers include Toyota, General Motors, Ford Motor, Honda of America, Cummins, Deere & Company, Volvo Trucks, Mercedes-Benz U.S. International, and Harley-Davidson; and (3) Tokai supplies to Toyota, Daihatsu, Hino, Mitsubishi, Suzuki, Mazda, Honda, Nissan, GM, Chrysler, Ford, Volvo, Saab, Isuzum Fuji Heavy Industries Ltd.

Freight-forwarder case:

As regards our shippers -- I wanted to let you know that most of our clients also have shipments by sea. Freight-forwarders in the US also act as distributors of pharma companies. If your friend needs US rep. please let me know.

Also found out that most freight forwarders do not have any contractual agreements with their shippers in India.

Regards,

Preetpal Grewal

Lear being investigated by European Commission

By JOSEPH SZCZESNY
Of The Oakland Press

SOUTHFIELD – Southfield-based Lear Corp. was notified by the European Commission that it is now part of an investigation into anti-competitive practices in Europe by suppliers of automotive wiring harnesses. "Lear is cooperating fully with the European Commission in its investigation, and I am confident that our company is not involved in any anticompetitive practices," said Bob Rossiter, Lear's chairman and chief executive officer.

Lear officials said the investigation involves the company's European operation.

The EU Commission, which is responsible for regulating economic activity in Europe, has confirmed it was investigating several suppliers but so far only Lear and Leoni Kabel Gmbh of Roth, Germany, have acknowledged they are part of the investigation. Japan's Fair Trade Commission also raided offices of Sumitomo Electric Industries Ltd. and Furukawa Electric Co.

The antitrust investigations are looking at whether the companies improperly divided up business with automakers, the EU Commission statement said.

Earlier this week, the Federal Bureau of Investigation and U.S. Department of Justice also appeared at the offices of three different Japanese automotive suppliers around Detroit, raising questions about whether the investigation was triggered by complaints from automakers.

A DOJ statement said the raids were part of a wider investigation into price fixing of electronic components, which raised more questions than it answered.

"The antitrust division is investigating the possibility of anti-competitive cartel conduct of automotive electronic component suppliers," Gina Talamona, a DOJ spokeswoman told The Oakland Press.

The antitrust division, however, almost always acts only after one company complains about unfair practices by a competitor or competitors. It also tends to move slowly and deliberately, which suggests the raids were in the works before the controversy over Toyota's recalls created headlines around the world.

As part of the investigation, government officials visited Yazaki North America's headquarters in Canton, as well as its offices in Lexington, Ky. and Columbus, Ohio.

From: Preetpal Grewal
Sent: Wednesday, October 6, 2010 12:29 AM
To: Jon Cuneo
Subject: RE: DOJ Investigation -- Revised Memo (2 more companies added)

Thanks!

Preetpal Grewal

Cuneo Gilbert & LaDuca, LLP
Rockefeller Center
620 Fifth Avenue
New York, NY 10020
Phone: (917) 639-5510
Cell: (917) 902-7476

From: Jon Cuneo
Sent: Wednesday, October 06, 2010 12:31 AM
To: Preetpal Grewal
Subject: RE: DOJ Investigation -- Revised Memo (2 more companies added)

This memo is perfect Preet. As you are working so hard I wanted to read it tonight after all. I am forwarding it to CJ and Jon Tostrud. Jon

---

From: Preetpal Grewal
Sent: Wednesday, October 06, 2010 12:22 AM
To: Jon Cuneo
Subject: DOJ Investigation -- Revised Memo (2 more companies added)

Jon,

I revised the memo -- added two more companies that are being investigated. At this stage we do not have enough information to determine the extent of the DOJ investigation of companies in the US that are being investigated by the EU Commission. How do we find this information? Is there any way to find out the extent of the cartel?

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Freight-forwarder case:

As regards our shippers -- I wanted to let you know that most of our clients also have shipments by sea. Freight-forwarders in the US also act as distributors of pharma companies. If your friend needs US rep. please let me know.

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Regards,

Preetpal Grewal

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Rockefeller Center
620 Fifth Avenue
New York, NY 10020
Phone: (917) 639-5510
Cell: (917) 902-7476

From: Preetpal Grewal
Sent: Tuesday, October 12, 2010 5:38 AM
To: Rana
Subject: CONFIDENTIAL E-MAIL RE. CASE
Attachments: Wire Harness Memo.doc

Hi!

It was a pleasure speaking with you just now. As we had discussed, attached please find my memo re. the wire harness cartel being investigated by the US Dept. of Justice, EU Commission and Japan Fair Trade Commission. It would be great if we could get Mahindra and Mahindra as our client.

Happy to call discuss if you have any questions. I do believe M&M have US offices and assembly lines in the US. If we could get their US company as a client, that too would be great. Anyways, we need a client.

As this case is yet to be filed, and the information is not readily available -- it is highly confidential. Please exercise discretion in disclosure of information to others.

Thanks for all your help.

Regards,
Preetpal Grewal

Cuneo Gilbert & LaDuca, LLP
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New York, NY 10020
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Cell: (917) 902-7476

CONFIDENTIAL

From: Preetpal Grewal
Sent: Thursday, October 7, 2010 6:59 PM
To: Jon Cuneo
Subject: Memo -- wire harness
Attachments: Wire Harness Memo.doc

Jon,

Please see the attached.

Regards,
Preetpal Grewal

Cuneo Gilbert & LaDuca, LLP
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620 Fifth Avenue
New York, NY 10020
Phone: (917) 639-5510
Cell: (917) 902-7476

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MEMORANDUM

Automotive Electrical Distribution Systems

Global Price Fixing Cartel

I. Background

On February 23, 2010, surprise inspections and searches in the automotive electrical distribution systems (aka wire harness) industry took place as part of an internationally coordinated investigation into price-fixing and customer allocation on the sales of automotive electric distribution systems used to link a car's computers to the relevant functions in the vehicle. The companies being investigated are suspected of forming a price-fixing cartel in the global market, in violation of the competition laws of the United States and elsewhere. These wire harness manufacturers began colluding in 2003 to divide up orders from automakers. Action by governmental anti-trust authorities of the United States, European Union, and Japan are ongoing in order to investigate and prosecute the global cartel.

II. The Cartelists

The alleged automotive electrical systems manufacturers that are subject to the investigation include the following companies:

THE PARTICIPANTS	THE INVESTIGATION
Yazaki Corp. and Yazaki North America	Under investigation by the United States Department of Justice, EU Commission and Japan Fair Trade Commission. Its offices in US, EU and Japan were raided. Yazaki is co-operating with the investigation.
Denso International America Inc.	Under investigation by the United States Department of Justice and EU Commission. Its offices in US were raided by the FBI. Denso is cooperating with the investigation.

Tokai Rika Co. and its division TRAM Inc.	Under investigation by the United States Department of Justice and the EU Commission. Its offices in the US were raided by the FBI. Tokai is cooperating with the investigation.
Lear Corporation	Under investigation by the United States Department of Justice and the EU Commission.
Sumitomo Electric Industries Ltd.	Under investigation by the Japan Fair Trade Commission. Its offices in Japan were searched.
Furukawa Electric Co.	Under investigation by the Japan Fair Trade Commission. Its offices in Japan were searched.
Leoni AG	Under investigation by the EU Commission. Leoni is cooperating with the commission.
SY Systems Technologies GmbH	Under investigation by the EU Commission.
Delphi Corp.	Under investigation by the EU Commission.

III. The Product

The automotive electrical distribution systems market is a multi-billion dollar industry. The companies being investigated hold more than 90 percent of the auto harness market, valued at more than $4.4 billion. In 2009, Yazaki which employs 150,000 people globally reported revenue of US$7,548 million from sale of electrical distribution systems.

The electrical distribution systems or wiring harnesses of the car is the second most expensive part in the car after the engine. The basic function of an electrical distribution system is to provide the electrical interconnections necessary to distribute electrical power and signals around the car. An electrical distribution system consists of a fusion of tightly bundled round wire harness assemblies, terminal and connector products, fuse boxes and junction boxes. This network winds its way to virtually every part of a vehicle, from the front lighting through the engine compartment, cockpit, and interior to the boot. The wire harness itself consists of raw, coiled wire that is cut to length and terminated. Wiring assemblies are typically a combination of round wire, flat wire, ultra thin wall cable and connection systems into complete systems for the distribution of power and signal throughout a vehicle.

This business, though dominated by a handful of companies, is competitive as electrical distribution systems manufacturers' fight for contracts with car manufacturers and search for ways to lower prices to boost profit margins.

IV. Typical Purchasers or Victims of the Cartel

Direct purchasers would include the car manufacturers that have directly purchased electrical distribution systems from the companies involved in the cartel.

Indirect purchasers would include companies that have purchased the electrical distribution systems manufactured by the companies involved in the cartel from distributors or wholesalers.

Victims of the electrical distribution systems cartel, and thus appropriate participants in a litigation, include any entity that purchased an electrical distribution system in at least one instance either directly or indirectly from any one of the above electrical distribution systems manufacturers being investigated from as early as 2003 to the present.

In order to be a party to the US litigation, it is important that at least in one instance the contract or purchase agreement should have been entered in the United States.

V. Counsel

In antitrust litigation such as the type contemplated against the electrical distribution systems cartelists, cartel victim typically recover a significant percentage of their total purchases of the price-fixed product, depending upon the results of the economic analysis performed.

Cuneo Gilbert & LaDuca, LLP will seek recovery for these victims' losses through settlement and if necessary through litigation. We encourage all purchasers from the cartelists to claim their losses through civil redress, as the fines levied by the commissions investigating the cartel companies is not distributed as compensation to the victims. Participation in recovery proceedings by large and diversified cartel victims is essential to the recovery of these overcharges by all cartel victims.

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From: Preetpal Grewal
Sent: Thursday, October 7, 2010 7:22 PM
To: Jon Cuneo
Subject: Tata

Jon,

I want to be 100% clear that we want [redacted] as our client. Correct? And it does not bother you that they have a sister company which is a [redacted], joint venture with Yazaki. Correct? We still want [redacted]-- and there are no conflict of interest issues, I presume. The last thing I want is us thrown out of the case on conflict issues.

Regards,
Preetpal Grewal

Cuneo Gilbert & LaDuca, LLP
Rockefeller Center
620 Fifth Avenue
New York, NY 10020
Phone: (917) 639-5510
Cell: (917) 902-7476

From: Preetpal Grewal
Sent: Monday, October 18, 2010 1:21 PM
To: Jon Cuneo; Pamela Gilbert; Charles LaDuca
Subject: FW: Wire Harness Client

All,

Please see below. I wanted to find out exactly what type of harnesses are purchased by the auto-shops. I will be meeting with the potential clients today. I have asked Chris to prepare a budget and make travel arrangements and also find appropriate lodging etc. I am no longer in a position to get cheap government accomodations. We were asked to vacate the government lodging in the middle of my last trip (one week before the governor who helped us get the lodging retired).

Just FYI:

A decent hotel costs about $200-300/night.

Food: Approx. $60/day

Taxis: Approx. $20-$50/day

Air Fare: Approx. $200-$400/week. Air fares vary drastically on a day to day basis.

I am sure that I can meet with the top management of most auto manufacturing companies. However, I am not certain of the out come of these meetings. I will also be talking to dealers and auto component suppliers who have do business here in the US and who would be able to assist us in getting a direct purchaser in the US.

It will also be nice to know to collect all facts that might help us in preparing our case, including but not limited to the purchase price of the wire harnesses for the years 2003 to present.

Warm regards,

Preetpal Grewal

Cuneo Gilbert & LaDuca, LLP
Rockefeller Center
620 Fifth Avenue
New York, NY 10020
Phone: (917) 639-5510
Cell: (917) 902-7476

From: Jon Cuneo
Sent: Wednesday, October 13, 2010 6:23 AM
To: Preetpal Grewal
Subject: Re: Wire Harness Client

Pls send to Pam and CJ also with a proposed budget. Jon

From: Preetpal Grewal
To: Jon Cuneo
Sent: Wed Oct 13 01:18:25 2010
Subject: Wire Harness Client

Jon,

I am working on getting a client. I am talking to a number of direct auto repairshops in the US, and have made connections with some auto companies in India. I will have to go to India soon in this regard. Please let me know if this is ok and if I should ask Chris to look for flights.

Regards,
Preetpal Grewal

Cuneo Gilbert & LaDuca, LLP
Rockefeller Center
620 Fifth Avenue
New York, NY 10020
Phone: (917) 639-5510
Cell: (917) 902-7476

From: Preetpal Grewal
Sent: Monday, October 18, 2010 2:09 PM
To: Charles LaDuca; Jon Cuneo; Pamela Gilbert
Subject: RE: Wire Harness Client

Hi CJ,

How are you? Thanks for the offer. I am meeting a number of people today. Let me find out what they have to say. I will get back to you as soon as I have confirmed knowledge of what clients will work for our case.

Also, the best client is an auto manufacturer. If you get that, that would be awesome. We need all the information we could get from an auto-manufacturer to file a lawsuit. As of today, we do not have any concrete factual information. Unfortunately, this information is also not available with the auto repair shop owners.

I will get back to you as soon as I am done with my meetings.

Regards,

Preetpal Grewal

Cuneo Gilbert & LaDuca, LLP
Rockefeller Center
620 Fifth Avenue
New York, NY 10020
Phone: (917) 639-5510
Cell: (917) 902-7476

From: Charles LaDuca
Sent: Monday, October 18, 2010 2:08 PM
To: Preetpal Grewal; Jon Cuneo; Pamela Gilbert
Subject: RE: Wire Harness Client

Hi Preet,

Thanks for your hard work in trying to get this case up and going.

Trust me, I understand how hard it is to take a case idea, research it, assemble your thoughts into a legalized Complaint and get it filed. An awful lot of work, and long hours, have to go into it. Luckily we have a great team at CGL, so we can all help.

Jon, Pam and I will talk about your proposal below -- asap. Also, could you please try to formulate in writing who a good client would be? I know we spoke this morning a bit, and I'm trying to follow the email trains, but I'm still trying to get my arms around it. For instance, we know some body shop owners, we know some auto parts store owners, etc. One example, my father's best high school buddy in Buffalo owns several Auto Zone stores. I'm sure he buys such harnesses.

Thanks, again.

From: Preetpal Grewal
Sent: Monday, April 4, 2011 12:23 PM
To: Annie Reiner
Subject: Wire harness
Attachments: Wire Harness Memo.doc

Annie,

I had done research for a potential wire harness cartel case (please see attached memo). I want to know if there are consumer complaints on the internet re. product defect in manufacture of wire harnesses. I had seen some previously but this needs to be done. All vehicles have wire harnesses -- as defined in my memo.

Thanks!

Preetpal Grewal

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MEMORANDUM

Automotive Electrical Distribution Systems

Suspected Global Price Fixing Cartel

I. Background

On February 23, 2010, surprise inspections and searches in the automotive electrical distribution systems (aka wire harness) industry took place as part of an internationally coordinated investigation into price-fixing and customer allocation on the sales of automotive electric distribution systems used to link a car's computers to the relevant functions in the vehicle. The companies being investigated are suspected of forming a price-fixing cartel in the global market, in violation of the competition laws of the United States and elsewhere. These wire harness manufacturers began colluding in 2003 to divide up orders from automakers. Action by governmental anti-trust authorities of the United States, European Union, and Japan are ongoing in order to investigate and prosecute the global cartel.

II. The Cartelists

The automotive electrical systems manufacturers that are subject to the investigation include the following companies:

THE PARTICIPANTS	THE INVESTIGATION
Yazaki Corp. and Yazaki North America	Under investigation by the United States Department of Justice, EU Commission and Japan Fair Trade Commission. Its offices in US, EU and Japan were raided. Yazaki is co-operating with the investigation.
Denso International America Inc.	Under investigation by the United States Department of Justice and EU Commission. Its offices in US were raided by the FBI. Denso is cooperating with the investigation.

Tokai Rika Co. and its division TRAM Inc.	Under investigation by the United States Department of Justice and the EU Commission. Its offices in the US were raided by the FBI. Tokai is cooperating with the investigation.
Lear Corporation	Under investigation by the United States Department of Justice and the EU Commission.
Sumitomo Electric Industries Ltd.	Under investigation by the Japan Fair Trade Commission. Its offices in Japan were searched.
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From: Preetpal Grewal
Sent: Monday, October 4, 2010 5:48 PM
To: Jon Cuneo; Charles LaDuca
Subject: Memo
Attachments: Wire Harness Memo.doc

Jon,

Attached please find my memo. I have included both direct and indirect purchasers under Typical purchasers heading. Happy to edit it as necessary.

Regards,
Preetpal Grewal

Cuneo Gilbert & LaDuca, LLP
Rockefeller Center
620 Fifth Avenue
New York, NY 10020
Phone: (917) 639-5510
Cell: (917) 902-7476

From: Preetpal Grewal
Sent: Thursday, October 14, 2010 4:17 AM
To: ranasarma@gmail.com
Subject: RE: Wire Harness

Hi! Great talking with you earlier. I do want a client for the class action (even if a small time purchaser).

However, as regards the auto-companies that are worried of coming forth we could do the following:

1. Ask them for price and other information to support our case (and also know their grievances);
2. Seek to sign them up solely for settlement purposes (i.e., they will not be a party to the litigation and we will also not disclose their names during settlement -- all confidential).

This way even if they do not join as parties we will have enough information to bring their claims and grievances within the purview of the case that is filed in court, and later seek a global resolution in out of court settlements (which is exactly what will happen).

I think this will address the concerns that auto manufacturers have in coming forth with their issues. I will call you and we can discuss further.

Thanks for all your help.

Preetpal Grewal

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Phone: (917) 639-5510
Cell: (917) 902-7476

From: ranasarma@gmail.com [ranasarma@gmail.com]
Sent: Wednesday, October 13, 2010 2:14 PM
To: Preetpal Grewal
Subject: Wire Harness

Hey Preet

Am back but the horrendous traffic thanks to the Common (Un)wealth Games has left me gasping ha ha ha. May I request that we speak in my morning tomorrow !!

Warm regards

Rana

Sent from BlackBerry® on Airtel